

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :
: **MAGISTRATE NO. 14-644**
v. :
: :
KYLE JONES :

**GOVERNMENT'S UNOPPOSED MOTION FOR CONTINUANCE PURSUANT TO
TITLE 18, UNITED STATES CODE, SECTION 3161(h)(7)(A)**

The United States of America, by and through its attorneys, Zane David Memeger, United States Attorney for the Eastern District of Pennsylvania, and Jennifer Chun Barry, Assistant United States Attorney, moves for a thirty-day continuance of the time within which an Indictment or Information must be filed in this case, and in support of this motion states as follows:

1. On June 20, 2014, a Complaint was filed by the United States Attorney's Office charging defendant Kyle Jones with bank fraud and aggravated identity theft, in violation of Title 18, United States Code, Sections 1344 and 1028A.
2. On June 24, 2014, the defendant made his initial appearance on the Complaint.
3. The Speedy Trial Act, 18 U.S.C. § 3161 et seq., requires that an Indictment or Information be filed within thirty days from the date on which the defendant made his initial appearance, in this case by July 24, 2014. 18 U.S.C. § 3161(b).
4. The government and the defendant are engaging in discussions to resolve this matter through a non-trial disposition.

5. Counsel for the defendant has represented that the defendant does not oppose the government's request for a thirty-day continuance.

WHEREFORE, for the above reasons, it is respectfully submitted that the ends of justice will be served best by the granting of a continuance of thirty days of the time within which to file an Indictment or Information in this case, that is, until August 23, 2014.

Respectfully submitted,

ZANE DAVID MEMEGER
United States Attorney

s/ Jennifer Chun Barry
Jennifer Chun Barry
Assistant United States Attorney

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ORDER

AND NOW, this _____ day of _____, 2014, the Court finds that the defendant and the government are engaging in discussions which may affect the charges against the defendant and that the defendant does not oppose the government's motion for continuance. The Court further finds that these reasons cause the ends of justice to best be served by granting a continuance in this matter, and that these reasons outweigh the interests of the public and the defendant in a speedy trial.

WHEREFORE, in accordance with Title 18, United States Code, Section 3161(h)(7)(A), it is hereby ORDERED that the time in which an Indictment or Information must be filed in the above action is continued for a period of thirty additional days, until August 23, 2014.

BY THE COURT:

HONORABLE CAROL SANDRA MOORE WELLS
Chief United States Magistrate Judge

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Unopposed Motion for Continuance Pursuant to Title 18, United States Code, Section 3161(h)(7)(A) has been served by ECF upon the following:

Elizabeth Toplin, Esq.
Defender Association of Philadelphia
Federal Court Division
The Curtis Center
601 Walnut Street, Suite 540 West
Independence Square West
Philadelphia, PA 19106

/s/ Jennifer Chun Barry
Jennifer Chun Barry
Assistant United States Attorney

DATED: July 15, 2014